

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Allergan PLC Securities Litigation

No. 18 Civ. 12089 (CM)(GWG)

**NOTICE OF MOTION AND MOTION OF THE GENERAL RETIREMENT SYSTEM  
OF THE CITY OF DETROIT FOR LEAVE TO INTERVENE; AND FOR  
APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF  
SELECTION OF LEAD COUNSEL**

PLEASE TAKE NOTICE that movant General Retirement System of the City of Detroit (“Detroit GRS”), by and through its counsel, will move this Court at a date and time as may be determined by this Court, before the Honorable Colleen McMahon in Courtroom 24A of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, for an order: (i) granting Detroit GRS’s motion for leave to intervene to preserve its claims in the above-captioned action pursuant to Fed. R. Civ. P. (“Rule”) 24; (ii) granting Detroit GRS’s motion for leave to intervene for appointment as lead plaintiff and a class representative pursuant to Rule 23 and the Court’s September 29, 2020 Order; (iii) approving Detroit GRS’s selection of Abraham, Fruchter & Twersky, LLP to serve as lead counsel on behalf of the putative class; and (iv) granting such other and further relief as the Court may deem just and proper.

This motion is made on the ground that Detroit GRS’s intervention is necessary or permitted to protect its individual interests and claims, as well as the interests of putative class, to promote judicial economy by stepping in to continue prosecuting claims of the putative class, and because intervention will not cause undue delay or inconvenience to the parties. In support of this motion, Detroit GRS submits herewith a memorandum of law, supporting declaration and accompanying exhibits, and a proposed order.

DATED: October 29, 2020

Respectfully submitted,

**ABRAHAM, FRUCHTER  
& TWERSKY, LLP**

By: /s/ Mitchell M.Z. Twersky

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*Attorneys for Movant General Retirement  
System of the City of Detroit*

**CERTIFICATE OF SERVICE**

I hereby certify under the penalty of perjury that on October 29, 2020, I authorized a true and correct copy of the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel registered to receive such notice.

/s/ Mitchell M.Z. Twersky

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